

LAGOMARSINO LAW  
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1           **LAGOMARSINO LAW**  
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10          Attorneys for Plaintiff Parnell Jay Fair

7           **UNITED STATES DISTRICT COURT**

8           **DISTRICT OF NEVADA**

9           PARNELL JAY FAIR, individually,

10          Plaintiff,

11          v.

12          LUKAS TURLEY, individually; ALEXANDER  
13          RYNDAK, individually;

14          Defendants.

15           CASE NO.: 2:20-cv-01841-JCM-BNW

16           **STIPULATION AND ORDER TO EXTEND**  
17           **DEADLINE FOR FILING OPPOSITIONS**  
18           **TO MOTIONS FOR SUMMARY**  
19           **JUDGMENT (ECF NO. 128 & 129)**

20           **(First Request)**

21          Plaintiff PARNELL JAY FAIR (“Plaintiff”) and Defendants LUKAS TURLEY and  
22          ALEXANDER RYNDAK (“Defendants”) (collectively “the Parties”), by and through their  
23          respective counsel, hereby stipulate and agree that the deadline for Plaintiff file his Opposition to (1)  
24          *Defendant Lukas Turley’s Motion for Summary Judgment* (ECF No. 128) and (2) *Defendant*  
25          *Alexander Ryndak’s Motion for Summary Judgment* (ECF No. 129) (the “Motions”) shall be  
26          extended to May 17, 2023.

27          On April 12, 2023, Defendants filed their Motions (ECF No. 128 & 129). Plaintiff’s  
28          Oppositions are currently due on May 3, 2023. However, handling attorney for Plaintiff has a full  
day deposition scheduled as well as a full day mediation in other matters next week. Additionally,  
the other two attorneys at the handling attorney’s office for Plaintiff are currently out of town for  
several days. This has resulted in handling attorney for Plaintiff taking on additional duties and tasks

1 while they are gone. Therefore, the Parties stipulate, and request, an extension up to, and  
2 including, May 17, 2023 for Plaintiff to file his Oppositions to the Motions.

3 This is the first request seeking an extension of the deadline for Plaintiff to respond  
4 to Defendants' Motions. This request is made in good faith and is not for the purpose of delay.

5 DATED this 21<sup>st</sup> day of April, 2023.

6 **LAGOMARSINO LAW**

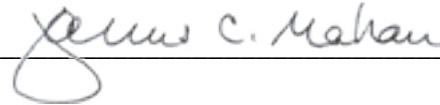
7  
8 /s/ Cory M. Ford  
9 ANDRE M. LAGOMARSINO, ESQ. (#6711)  
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11 *Attorneys for Plaintiff*  
*Parnell Jay Fair*

DATED this 21<sup>st</sup> day of April, 2023.

5 **KAEMPFER CROWELL**

6  
7 /s/ Lyssa S. Anderson  
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RYAN W. DANIELS, ESQ. (#13094)  
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Telephone: (702) 792-7000  
19 *Attorneys for Defendants*  
*Lukas Turley and Alexander Ryndak*

10 **IT IS SO ORDERED.**

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18 UNITED STATES DISTRICT COURT JUDGE  
19 DATED: April 21, 2023

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